

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

CHAD PELISHEK,

Plaintiff,

v.

Case No. 23-CV-1048

CITY OF SHEBOYGAN, et al.,

Defendants.

**DECLARATION OF ELIZABETH MAJERUS IN OPPOSITION TO PLAINTIFF'S
MOTION FOR PARTIAL SUMMARY JUDGMENT**

I, Elizabeth Majerus, pursuant to 28 U.S.C. § 1746, hereby depose and state under penalty of perjury that the following is true and correct to the best of my knowledge and belief:

1. My name is Elizabeth Majerus. I am an adult resident of the State of Wisconsin.
2. I am currently a Deputy City Attorney for the City of Sheboygan ("City"), Wisconsin, a position that I have held since 2024. I was hired as Assistant City Attorney in 2022.
3. The City had experienced significant disruption in the workplace as a result of the racial slur incident as well as the Hall investigation which culminated in Wolf's termination and subsequent litigation.
4. With respect to the February 7, 2023 and March 8, 2023 emails, the City has an interest in ensuring workplace harmony and reducing disruption of City employees abilities to perform their duties.
5. With respect to the February 7, 2023 and March 8, 2023 emails, the City had an interest in ensuring that Plaintiff, a management level employee, whose words and actions could bind the City, did not speak about Wolf's active litigation filed against the City with Wolf or his attorney; requiring

notification of contact by Wolf or his attorney to the City Attorney's office and requiring that communications about Wolf or City business involving Wolf occur in the presence of the City's attorney.

Dated at Sheboygan, Wisconsin this 4th day of April, 2025.



Elizabeth Majerus, Deputy City Attorney